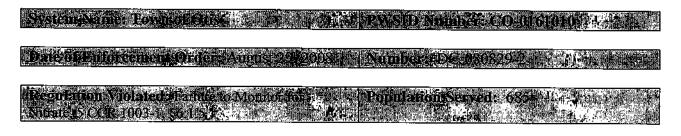
ADMINISTRATIVE PENALTY COMPUTATION WORKSHEET VIOLATION NUMBER: 3 (Count 2 Sample Point 005)



Part I - Base Penalty Calculation

Violation(Pype	Population Range	Amount in Dollars
Line 1 Failure to Monitor for Nitrate – Calendar Year 2006	>500	\$250.00

	Aggravating / Ningating Factors / Discrease o	Penalty Amount in Begresse Dollars
Line 2	Factor A: Threat to Public Health and Welfare	\$0.00
	Justification: n/a	
Line 3	Factor B: Intentional, Reckless, or Negligent Actions	\$0.00
	Justification: n/a	_
Line 4	Factor C: Recalcitrance or Recidivism	\$0.00
	Justification: n/a	
Line 5	Factor D: Voluntary and Complete Disclosure of Violations	\$0.00
	Justification: n/a	
Line 6	Factor E: Full and Prompt Cooperation	\$0.00
	Justification: n/a	
Line 7	Factor F: Environmental Compliance Program	\$0.00
	Justification: n/a	
Line 8	Factor G: Other Aggravating or Mitigating Circumstances	\$0.00
	Justification: n/a	
Line 9	Sum of Lines 2 through Line 8	\$0.00
Line 10	Adjusted Base Penalty (Sum of Line 1 + Line 9)	\$250.00

Part III - Determination of Days of Violation

The state of the state of

		Violentie
Line 11	Total Days of Violation	1
	Justification: The Division has chosen to consider the 2007 failure to moviolation as a single day violation.	nitor for Nitrate

Part IV - Determination of Multi-Day Penalty Amount

 -			Amount in Dollars
Line 12	Multi-Day Penalty Amount		\$250.00
	Calculations: Day 1 (\$250.00)	= \$250.00	

Part V - Economic Benefit Consideration

		Amount in Dollars
Line 13	Economic Benefit:	\$70.00
	Justification: The Division believes that the Town of failing to monitor since the Town avoided the cost of labor involved in obtaining sample bottles, conduct samples to a lab.	of the test itself as well as the cost of the

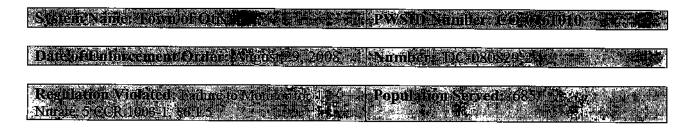
	Aire an inc
Line 14 Total Administrative Penalty: (Line 12 + Line 13)	\$320.00

Part VII - Ability to Pay Adjustment

	···—-		hapina 🌡
Line 15	Ability to Pay Reduction:		\$0.00
	Justification: Not Applicable. T	he Division does not have any information su	ggesting that the
	Town of Otis has an inability to	pay the assessed penalty amount.	

-		Astrophytic : Dollars
Line 16	Total Administrative Penalty: (Line 14 - Line 15)	\$320.00
	(Line 14 - Line 13)	

<u>ADMINISTRATIVE PENALTY COMPUTATION WORKSHEET</u> *VIOLATION NUMBER: 3* (Count 1 Sample Point 004)



Part I - Base Penalty Calculation

Violatian Eype	Population Range	Amount in Bollars
Line 1 Failure to Monitor for Nitrate – Calendar Year 2007	>500	\$250.00

	Aggravating/Mitigating Factors	% BasePenalty Inexease or Decrease	Amount in Dollars
Line 2	Factor A: Threat to Public Health and Welfare		\$0.00
	Justification: n/a		· .
Line 3	Factor B: Intentional, Reckless, or Negligent Actions		\$0.00
	Justification: n/a		
Line 4	Factor C: Recalcitrance or Recidivism Justification: Town of Otis failed to monitor for N	25%	\$62.50
	has demonstrated a history/pattern of not obeying obligations, thereby revealing a level of disregard Otis's continued noncompliance with the same vid 25%.	d for regulatory programs. T_{ij}	he Town of
Line 5	Factor D: Voluntary and Complete Disclosure of Violations		\$0.00
	Justification: n/a	-	
Line 6	Factor E: Full and Prompt Cooperation		\$0.00
	Justification: n/a		
Line 7	Factor F: Environmental Compliance Program		\$0.00
••	Justification: n/a		
Line 8	Factor G: Other Aggravating or Mitigating Circumstances		\$0.00
	Justification: n/a		
Line 9	Sum of Lines 2 through Line 8		\$0.00
Line 10	Adjusted Base Penalty (Sum of Line 1 + Line 9)	· · ·	\$312.50

Part III - Determination of Days of Violation

	<u> </u>	A Violation
Line 11	Total Days of Violation	1
	Justification: The Division has chosen to consider the 2007 fa- violation as a single day violation.	ilure to monitor for Nitrate

Part IV - Determination of Multi-Day Penalty Amount

			Amount in
Line 12	Multi-Day Penalty Amount		\$312.50
	Calculations: Day 1 (\$312.50)	= \$312.50	

Part V - Economic Benefit Consideration

		Amount in Bollars
Line 13	Economic Benefit:	\$70.00
.;	Justification: The Division believes that the Town of failing to monitor since the Town avoided the cost of labor involved in obtaining sample bottles, conducting samples to a lab.	f the test itself as well as the cost of the

r-		e Dalkrete
Line 14	Total Administrative Penalty:	##C# #0
	(Line 12 + Line 13)	\$382.50

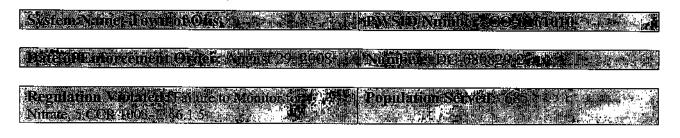
Part VII - Ability to Pay Adjustment

TANKS SAFET

Line 15	Ability to Pay Reduction:	\$0.00
i	Justification: Not Applicable. The Division does not have any information s	uggesting that the
	Town of Otis has an inability to pay the assessed penalty amount.	1

		Amografin Dollars
Line 16	Total Administrative Penalty:	 2202 20
	(Line 14 - Line 15)	 \$382.50

ADMINISTRATIVE PENALTY COMPUTATION WORKSHEET VIOLATION NUMBER: 3 (Count 2 Sample Point 005)



Part I - Base Penalty Calculation

-1	Violation Type	Population Range	Amount in "". Dollars
Line 1	Failure to Monitor for Nitrate – Calendar Year 2007	>500	\$250.00

	Aggravating / Miligating Pactors	%Base Penalty Increase or Decrease	Amount in Dollars
Line 2	Factor A: Threat to Public Health and Welfare		\$0.00
	Justification: n/a		
Line 3	Factor B: Intentional, Reckless, or Negligent Actions		\$0.00
	Justification: n/a		
Line 4	Factor C: Recalcitrance or Recidivism	25%	\$62.50
Line 5	obligations, thereby revealing a level of disregard for Otis's continued noncompliance with the same violates. 25%. Factor D: Voluntary and Complete Disclosure		adjustment of
Dillo 0	of Violations		\$0.00
	Justification: n/a		
Line 6	Factor E: Full and Prompt Cooperation	·····	\$0.00
	Justification: n/a	·	
Line 7	Factor F: Environmental Compliance Program		\$0.00
	Justification: n/a		
Line 8	Factor G: Other Aggravating or Mitigating Circumstances		\$0.00
	Justification: n/a		
Line 9	Sum of Lines 2 through Line 8		\$0.00

	A COMPANY OF THE PROPERTY OF T	
Line 10	Adjusted Base Penalty (Sum of Line 1 + Line 9)	\$312.50

Part III - Determination of Days of Violation

C. Marie

		Ventation
Line 11	Total Days of Violation	1
	Justification: The Division has chosen to consider the 2007 violation as a single day violation.	failure to monitor for Nitrate

Part IV - Determination of Multi-Day Penalty Amount

T: 45			Amount in Dollars
Line 12	Multi-Day Penalty Amount		\$312.50
	Calculations: Day 1 (\$312.50)	= \$312.50	

Part V - Economic Benefit Consideration

<u> </u>		Amount in Bollars
Line 13	Economic Benefit:	\$70.00
	Justification: The Division believes that the Town of Ot failing to monitor since the Town avoided the cost of the labor involved in obtaining sample bottles, conducting samples to a lab.	e test itself as well as the cost of the

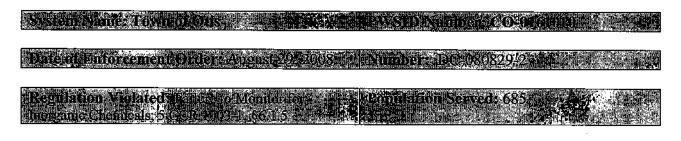
Line 14	Total Administrative Penalty:		0000 70
	(Line 12 + Line 13)		\$382.50

Part VII - Ability to Pay Adjustment

		Pavitton :
Line 15	Ability to Pay Reduction:	\$0.00
	Justification: Not Applicable. The Division does not have any information st	ggesting that the
	Town of Otis has an inability to pay the assessed penalty amount.	

	Amonet in Bolars
Line 16 Total Administrative Penalty:	0202.50
(Line 14 - Line 15)	\$382.50

ADMINISTRATIVE PENALTY COMPUTATION WORKSHEET VIOLATION NUMBER: 4 (Count 1 Sample 004)



Part I - Base Penalty Calculation

	Violation Type	Population Range	Amount in Dollars
Line 1:	Failure to Monitor for Inorganic Chemicals – Compliance Period January 1, 2005 through December 31, 2007	>500	\$125.00

	Aggravating/Mingaing Gatters	"Chase Penalty Announting increase or Decrease Bollars
Line 2	Factor A: Threat to Public Health and Welfare	\$0.00
	Justification: n/a	•
Line 3	Factor B: Intentional, Reckless, or Negligent Actions	\$0.00
	Justification: n/a	
Line 4	Factor C: Recalcitrance or Recidivism	\$0.00
	Justification: n/a	
Line 5	Factor D: Voluntary and Complete Disclosure of Violations	\$0.00
	Justification: n/a	•
Line 6	Factor E: Full and Prompt Cooperation	\$0.00
	Justification: n/a	···
Line 7	Factor F: Environmental Compliance Program	\$0.00
	Justification: n/a	
Line 8	Factor G: Other Aggravating or Mitigating Circumstances	\$0.00
	Justification: n/a	
Line 9	Sum of Lines 2 through Line 8	\$0.00
Line 10	Adjusted Base Penalty (Sum of Line 1 + Line 9)	\$125.00

Part III - Determination of Days of Violation

W.F.

27.230

		Viulation
Line 11	Total Days of Violation	1
	Justification: The Division has chosen to consider the failure to mon	itor for inorganic
	chemicals violation as a single day violation.	, ,

Part IV - Determination of Multi-Day Penalty Amount

-			Amount in A Pollars
Line 12	Multi-Day Penalty Amount		\$125.00
	Calculations: Day I (\$125.00)	= \$125.00	

Part V - Economic Benefit Consideration

			Amount in Dollars
Line 13	Economic Benefit:		\$265.00
	Justification: The Division believes that to failing to monitor since the town has avoidabor involved in obtaining sample bottles samples to a lab.	ided the cost for the tests	as well as the cost of the

Part VI - Violation Penalty Total

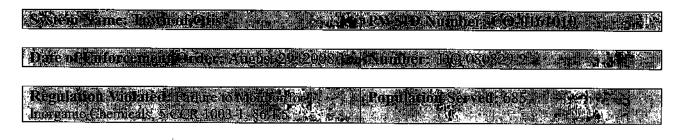
	Z : Dalas
Line 14 Total Administrative Penalty: (Line 12 + Line 13)	\$390.00

Part VII - Ability to Pay Adjustment

-			
Line 15	Ability to Pay Reduction:		\$0.00
	Justification: Not Applicable. The Division does	not have any information su	ggesting that the
	Town of Otis has an inability to pay the assessed		00

Line 16	Total Administrative Penalty:		#200 00
	(Line 14 - Line 15)	·-	\$390.00

ADMINISTRATIVE PENALTY COMPUTATION WORKSHEET VIOLATION NUMBER: 4 (Count 2 Sample 005)



Part I - Base Penalty Calculation

	Violation (Type ***)	Population Range	Amount in Tolkis
Chemi Januar	to Monitor for Inorganic cals – Compliance Period y 1, 2005 through ber 31, 2007	>500	\$125.00

	Aggrassing / Mitigating Eastors Increase of	enalty Amount is Doctease I Dollars
Line 2	Factor A: Threat to Public Health and Welfare	\$0.00
	Justification: n/a	
Line 3	Factor B: Intentional, Reckless, or Negligent Actions	\$0.00
	Justification: n/a	
Line 4	Factor C: Recalcitrance or Recidivism	\$0.00
	Justification: n/a	_
Line 5	Factor D: Voluntary and Complete Disclosure of Violations	\$0.00
	Justification: n/a	
Line 6	Factor E: Full and Prompt Cooperation	\$0.00
	Justification: n/a	
Line 7	Factor F: Environmental Compliance Program	\$0.00
	Justification: n/a	
Line 8	Factor G: Other Aggravating or Mitigating Circumstances	\$0.00
	Justification: n/a	
Line 9	Sum of Lines 2 through Line 8	\$0.00
Line 10	Adjusted Base Penalty (Sum of Line 1 + Line 9)	\$125.00

Part III - Determination of Days of Violation

Line 11	Total Days of Violation	1
Justification: The Division has chosen to consider the failure to monitor for inorganic chemicals violation as a single day violation.		

Part IV - Determination of Multi-Day Penalty Amount

			Amount in Dollars
Line 12	Multi-Day Penalty Amount		\$125.00
	Calculations: Day 1 (\$125.00)	= \$125.00	

Part V - Economic Benefit Consideration

		Amountin Bollars
Line 13	Economic Benefit:	\$265.00
	Justification: The Division believes that the Town of failing to monitor since the town has avoided the collabor involved in obtaining sample bottles, conducting samples to a lab.	st for the tests as well as the cost of the

Part VI - Violation Penalty Total

The second second

Same and a

	<u>.</u>	 A Sabolian S
Line 14 Total Administr (Line 12 + Lin		\$390.00

Part VII - Ability to Pay Adjustment

			2 Din 6 kg (s
Line 15	Ability to Pay Reduction:		\$0.00
	Justification: Not Applicable. The Division does	not have any information su	ggesting that the
	Town of Otis has an inability to pay the assessed		.

		- Aniountur's Dollars
Line 16	Total Administrative Penalty:	#200 DD
	(Line 14 - Line 15)	\$390.00

ADMINISTRATIVE PENALTY COMPUTATION WORKSHEET VIOLATION NUMBER: 5

System Names For an Observation of the state of the System Names Fee Data and the state of the System Names Fee Data and the state of the System Names Fee Data and the state of the System Names Fee Data and the state of the System Names Fee Data and the state of the System Names Fee Data and the System Na
Pare of Enfoncement Order: August 2002008: Asimir Cras Dis 080829/24 - 1915
Regulation Sciented: realise to Monitor for Lead . Population Served: 685

Part I - Base Penalty Calculation

	Violation Type	Population Range	Amount in # Bollars
Line 1	Failure to Monitor for Lead & Copper January 1, 2005 – December 31, 2007	> 500 Served	\$125.00

	Appravating / Mitigating Bacidis Track Increase of	
Line 2	Factor A: Threat to Public Health and Welfare	\$0.00
	Justification: n/a	
Line 3	Factor B: Intentional, Reckless, or Negligent Actions	\$0.00
	Justification: n/a	
Line 4	Factor C: Recalcitrance or Recidivism	\$0.00
	Justification: n/a	
Line 5	Factor D: Voluntary and Complete Disclosure of Violations	\$0.00
	Justification: n/a	<u> </u>
Line 6	Factor E: Full and Prompt Cooperation	\$0.00
	Justification: n/a	
Line 7	Factor F: Environmental Compliance Program	\$0.00
	Justification: n/a	
Line 8	Factor G: Other Aggravating or Mitigating	\$0.00
	Circumstances	
	Justification: n/a	
Line 9	Sum of Lines 2 through Line 8	\$50.00
Line 10	Adjusted Base Penalty (Sum of Line 1 + Line 9)	\$125.00

Part III - Determination of Days of Violation

		ï
Line 11	Total Days of Violation 1	
	Justification: The Division has chosen to consider the failure to monitor for lead and copper violation as a single day violation.	

Part IV - Determination of Multi-Day Penalty Amount

			Amount in Dollars
Line 12	Multi-Day Penalty Amount		\$125.00
	Calculations: Day I (\$125.00)	= \$125.00	-

Part V - Economic Benefit Consideration

			Amount in Dollars
Line 13	Economic Benefit:		\$78.00
	Justification: The Division believes that failing to monitor since the town has availabor involved in obtaining sample bottlesamples to a lab.	oided the cost for the tests a	s well as the cost of the

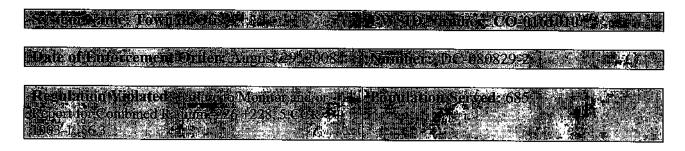
<u></u>		 Anduitin L.Delfars
Line 14	Total Administrative Penalty:	****
	(Line 12 + Line 13)	\$203.00

Part VII - Ability to Pay Adjustment

Line 15	Ability to Pay Reduction:	\$0.00
,	Justification: Not Applicable. The Division does not have any inform	ation suggesting that the
	Town of Otis has an inability to pay the assessed penalty amount.	

		Amoiintánas Dolláis
Line 16	Total Administrative Penalty:	0000.00
	(Line 14 - Line 15)	\$203.00

<u>ADMINISTRATIVE PENALTY COMPUTATION WORKSHEET</u> VIOLATION NUMBER: 6 (Count 1 Sample 004)



<u>Part I – Base Penalty Calculation</u>

- 11-2	wolard Type	Copulation Range	Amount in
Line 1	Failure to Monitor and/or Report for Combined Radium -226 +228 First, Second, Third and Fourth Quarters 2007	> 500 Served	\$125.00

	Aggravating / Vitigating Factors	Base Penalty Amount in ase of Degraphs
Line 2	Factor A: I hreat to Public Health and Welfare	\$0.00
	Justification: n/a	
Line 3	Factor B: Intentional, Reckless, or Negligent Actions	\$0.00
	Justification: n/a	
Line 4	Factor C: Recalcitrance or Recidivism	\$0.00
	Justification: n/a	
Line 5	Factor D: Voluntary and Complete Disclosure of Violations	\$0.00
	Justification: n/a	
Line 6	Factor E: Full and Prompt Cooperation	\$0.00
	Justification: n/a	
Line 7	Factor F: Environmental Compliance Program	\$0.00
	Justification: n/a	
Line 8	Factor G: Other Aggravating or Mitigating Circumstances	\$0.00
	Justification: n/a	
Line 9	Sum of Lines 2 through Line 8	\$50.00
Line 10	Adjusted Base Penalty (Sum of Line 1 + Line 9)	\$125.00

Part III - Determination of Days of Violation

		Properties
Line 11	Total Days of Violation	1
	Justification: The Division has chosen to consider the failure Radium -226 +228 violation as a single day violation.	to monitor for Combined

Part IV - Determination of Multi-Day Penalty Amount

			Amountain Dollars
Line 12	Multi-Day Penalty Amount		\$125.00
	Calculations: Day 1 (\$125.00)	= \$125.00	

Part V - Economic Benefit Consideration

		Amount to Dollars
Line 13	Economic Benefit:	\$78.00
	Justification: The Division believes that the Town failing to monitor since the town has avoided the labor involved in obtaining sample bottles, conductantly samples to a lab.	cost for the tests as well as the cost of the

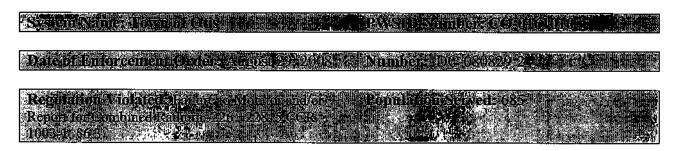
		Amountain Dollas or
Line 14	Total Administrative Penalty: (Line 12 + Line 13)	6202.00
	(Line 12 + Line 13)	\$203.00

Part VII - Ability to Pay Adjustment

P-1			
Line 15	Ability to Pay Reduction:		\$0.00
	Justification: Not Applicable. The Division does	not have any information su	ggesting that the
	Town of Otis has an inability to pay the assessed	penalty amount.	

		Amount in. Dollars
Line 16	Total Administrative Penalty:	6202.00
	(Line 14 - Line 15)	\$203.00

ADMINISTRATIVE PENALTY COMPUTATION WORKSHEET VIOLATION NUMBER: 6 (Count 2 Sample 005)



Part I - Base Penalty Calculation

	Violation Type	Population-Range	Amount in
Line 1	Failure to Monitor and/or Report for Combined Radium -226 +228 First, Second, Third and Fourth Quarters 2007	> 500 Served	\$125.00

	Aggravatine / Witte aring Factors Lucreas of De	nally Austantiu ecrease Dollars
Line 2	Factor A: Threat to Public Health and Welfare	\$0.00
	Justification: n/a	
Line 3	Factor B: Intentional, Reckless, or Negligent Actions	\$0.00
_	Justification: n/a	
Line 4	Factor C: Recalcitrance or Recidivism	\$0.00
	Justification: n/a	
Line 5	Factor D: Voluntary and Complete Disclosure of Violations	\$0.00
	Justification: n/a	
Line 6	Factor E: Full and Prompt Cooperation	\$0.00
	Justification: n/a	
Line 7	Factor F: Environmental Compliance Program	\$0.00
	Justification: n/a	
Line 8	Factor G: Other Aggravating or Mitigating Circumstances	\$0.00
	Justification: n/a	
Line 9	Sum of Lines 2 through Line 8	\$50.00
Line 10	Adjusted Base Penalty (Sum of Line 1 + Line 9)	\$125.00

Part III - Determination of Days of Violation

Owners and the second second second

Total Days of Violation	1
Justification: The Division has chosen to consider the fai Radium -226 +228 violation as a single day violation.	ilure to monitor for Combined
-	Justification: The Division has chosen to consider the far

Part IV - Determination of Multi-Day Penalty Amount

			Amount in Dollais
Line 12	Multi-Day Penalty Amount		\$125.00
	Calculations: Day 1 (\$125.00)	= \$125.00	

Part V - Economic Benefit Consideration

			Amount in Bollars
Line 13	Economic Benefit:		\$78.00
	Justification: The Division believes th		
	failing to monitor since the town has	avoided the cost for the tests	as well as the cost of the
	labor involved in obtaining sample bo	ottles, conducting the testing,	and transporting the
	samples to a lab.		

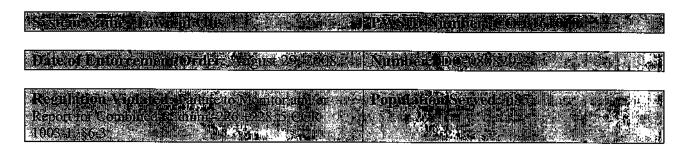
		Control of the contro
Line 14 Total Administrat	itive Penalty:	0202.00
(Line 12 + Line	: 13)	\$203.00

Part VII - Ability to Pay Adjustment

			Dallars 2
Line 15	Ability to Pay Reduction:		\$0.00
	Justification: Not Applicable. The Division does	s not have any information su	ggesting that the
L	Town of Otis has an inability to pay the assessed		

		Amountin Dollars
Line 16	Total Administrative Penalty:	g202.00
	(Line 14 - Line 15)	\$203.00

ADMINISTRATIVE PENALTY COMPUTATION WORKSHEET VIOLATION NUMBER: 6 (Count 1 Sample 004)



Part I - Base Penalty Calculation

	Violating Cyle	Population/Range	Amount in Dullars
Line 1	Failure to Monitor and/or Report for		
	Combined Radium -226 +228	> 500 Served	\$125.00
	First and Second Quarters 2008		

	Aggravating / Miligating Factors	%) Pase Penalty Interess or Decrease	Amount in
Line 2	Factor A: Threat to Public Health and Welfare		\$0.00
	Justification: n/a		
Line 3	Factor B: Intentional, Reckless, or Negligent Actions		\$0.00
	Justification: n/a	···	
Line 4	Factor C: Recalcitrance or Recidivism	25%	\$31.25
Line 5	First, Second, Third and Fourth Quarters 2007. a history/pattern of not obeying or complying with revealing a level of disregard for regulatory prognoncompliance with the same violation supports Factor D: Voluntary and Complete Disclosure	th their regulatory obligation grams. The Town of Otis's co	ns, thereby ontinued %.
	of Violations Justification: n/a		\$0.00
Line 6	Factor E: Full and Prompt Cooperation Justification: n/a		\$0.00
Line 7	Factor F: Environmental Compliance Program Justification: n/a		\$0.00
Line 8	Factor G: Other Aggravating or Mitigating Circumstances		\$0.00
	Justification: n/a		
Line 9	Sum of Lines 2 through Line 8		\$25.00

Line 10 Adjusted Base Penalty (Sum of Line 1 + Line 9)	 \$156.25

Part III - Determination of Days of Violation

		Yadrioo 25
Line 11	Total Days of Violation	1
	Justification: The Division has chosen to consider the failure to monitor Radium -226 +228 violation as a single day violation.	for Combined

Part IV - Determination of Multi-Day Penalty Amount

			Amount in Déliats
Line 12	Multi-Day Penalty Amount		\$156.25
	Calculations: Day 1 (\$156.25)	= \$156.25	

Part V - Economic Benefit Consideration

		Amonat in Dollars
Line 13	Economic Benefit:	\$200.00
	Justification: The Division believes that the Town of Otis realized an edfailing to monitor since the town has avoided the cost for the tests as we labor involved in obtaining sample bottles, conducting the testing, and samples to a lab.	ell as the cost of the

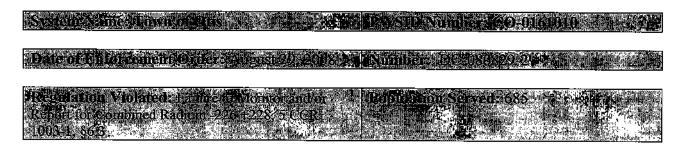
Line 14	Total Administrative Penalty:	0256.25
	(Line 12 + Line 13)	 \$356.25

Part VII - Ability to Pay Adjustment

_		
Line 15	Ability to Pay Reduction:	\$0.00
ĺ	Justification: Not Applicable. The Division does not have any information su	ggesting that the
	Town of Otis has an inability to pay the assessed penalty amount.	•

	Amount in Dollars &
Line 16 Total Administrative Penalty:	#256.0F
(Line 14 - Line 15)	\$356.25

ADMINISTRATIVE PENALTY COMPUTATION WORKSHEET VIOLATION NUMBER: 6 (Count 2 Sample 005)



Part I - Base Penalty Calculation

	Violation Type	Rojelation Range	Amoint'in Bollars
Line 1	Failure to Monitor and/or Report for		
	Combined Radium -226 +228	> 500 Served	\$125.00
	First and Second Quarters 2008		

Part II - Application of Aggravating or Mitigating Factors

	Aggravating (Tollingating Factors	% Base Benaits Bucrease of Decrease	Aritoontan ? Bollars
Line 2	Factor A: Threat to Public Health and Welfare		\$0.00
	Justification: n/a		
Line 3	Factor B: Intentional, Reckless, or Negligent		\$0.00
	Actions		\$0.00
	Justification: n/a		
Line 4	Factor C: Recalcitrance or Recidivism	25%	\$31.25
	Justification: Town of Otis failed to monitor and First, Second, Third and Fourth Quarters 2007. a history/pattern of not obeying or complying wi revealing a level of disregard for regulatory prognoncompliance with the same violation supports	Therefore, the Town of Otis I th their regulatory obligation grams. The Town of Otis's co	has demonstrated as, thereby ontinued
Line 5	Factor D: Voluntary and Complete Disclosure of Violations		\$0.00
Line 6	Justification: n/a		40.00
Lille 0	Factor E: Full and Prompt Cooperation Justification: n/a	<u> </u>	\$0.00
Line 7	Factor F: Environmental Compliance Program		\$0.00
	Justification: n/a		
Line 8	Factor G: Other Aggravating or Mitigating		\$0.00
	Circumstances		φυ.υυ ——————————————————————————————————
	Justification: n/a		
Line 9	Sum of Lines 2 through Line 8		\$25.00

Town of Otis

Drinking Water - Enforcement Order

Page 48 of 53

		(Amunité i
Line 10	Adjusted Base Penalty (Sum of Line 1 + Line 9)	 \$156.25

Part III - Determination of Days of Violation

		Days of Violation
Line 11	Total Days of Violation	1
	Justification: The Division has chosen to consider the failure to a Radium -226 +228 violation as a single day violation.	monitor for Combined

Part IV - Determination of Multi-Day Penalty Amount

			Amount in: Dollars
Line 12	Multi-Day Penalty Amount		\$156.25
	Calculations: Day 1 (\$156.25)	= \$156.25	

Part V - Economic Benefit Consideration

		Amount in J Dolkais
Line 13	Economic Benefit:	\$200.00
	Justification: The Division believes that the Town of Otis realized an edfailing to monitor since the town has avoided the cost for the tests as we labor involved in obtaining sample bottles, conducting the testing, and taken the samples to a lab.	ell as the cost of the

Part VI - Violation Penalty Total

a and the contract of the

		·	Dolla.
Line 14	Total Administrative Penalty:		
	(Line 12 + Line 13)		\$356.25
	······································		

Part VII - Ability to Pay Adjustment

Line 15	Ability to Pay Reduction:		\$0.00
	Justification: Not Applicable. The Division does	not have any information su	ggesting that the
l	Town of Otis has an inability to pay the assessed	l penalty amount.	

		Amount in Dollars
Line 16	Total Administrative Penalty:	6256.25
	(Line 14 - Line 15)	\$356.25

ADMINISTRATIVE PENALTY COMPUTATION WORKSHEET VIOLATION NUMBER: 7

System Name: Town offdist 17 12 12 12 PWSID Name of CO. Off total 12 12 12 12 12 12 12 12 12 12 12 12 12
Date of Enforcement Order: August 29, 2008.
Regulation Violated: Failure to Report for Residual Population Scryed: 685 Disurfection Concentration: 5 CCR 100341. \$7.5

Part I - Base Penalty Calculation

Violation Type:	Population Range	Amount in Dollars
Line 1: Failure to Report for Residual Di Concentration – 1 st and 2 nd Quart		\$38.00

	Aggravating / Mitigating Factors / 7.6 Base Penalty Increase or Decrease	Amount in Dollars
Line 2	Factor A: Threat to Public Health and Welfare	\$0.00
	Justification: n/a	
Line 3	Factor B: Intentional, Reckless, or Negligent Actions	\$0.00
	Justification: n/a	
Line 4	Factor C: Recalcitrance or Recidivism	\$0.00
	Justification: n/a	<u> </u>
Line 5	Factor D: Voluntary and Complete Disclosure of Violations	\$0.00
	Justification: n/a	
Line 6	Factor E: Full and Prompt Cooperation	\$0.00
	Justification: n/a	·
Line 7	Factor F: Environmental Compliance Program	\$0.00
	Justification: n/a	· · · · · ·
Line 8	Factor G: Other Aggravating or Mitigating Circumstances	\$0.00
	Justification: n/a	
Line 9	Sum of Lines 2 through Line 8	\$15.00
Line 10	Adjusted Base Penalty (Sum of Line 1 + Line 9)	\$38.00

Part III - Determination of Days of Violation

		Violation
Line 11	Total Days of Violation	1
	Justification: The Division has chosen to consider the failure to repodisinfection concentration violation as a single day violation.	rt for residual

Part IV - Determination of Multi-Day Penalty Amount

			Amount in Dollars:
Line 12	Multi-Day Penalty Amount		 \$38.00
	Calculations: Day 1 (\$38.00)	= \$38.00	

Part V - Economic Benefit Consideration

		Amount in 's Dollars'
Line 13	Economic Benefit:	\$40.00
	Justification: The Division believes that the Tow failing to report since she avoided the cost of the the information into the required reports.	

Part VI - Violation Penalty Total

Line 14	Total Administrative Penalty:		#70 OO
	(Line 12 + Line 13)		\$78.00

Part VII - Ability to Pay Adjustment

Line 15	Ability to Pay Reduction:		\$0.00
Justification: Not Applicable – The Division does not have any information suggesting that			
	the Town of Otis has an inability to pay the asses	ssed penalty amount.	

Part VIII - Final Adjusted Penalty

PERSONAL PROPERTY.

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Line 16	Total Administrative Penalty:			050.00
	(Line 14 - Line 15)			\$78.00